

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Frank Joseph Keough and
Maria Concetta Keough,**

Case # 19-13280

Debtors

CHAPTER 13

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Frank Joseph Keough and Maria Concetta Keough, by and through their counsel, Charles Laputka, Esquire, has filed a Motion for Modification of Plan Post Confirmation.

1. Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)
2. If you do not want the Court to grant the relief sought in the Motion or if you want the Court to consider your views on the Motion, then on or before January 8, 2021 you or your attorney must file a response to the Motion.
3. A hearing on the Motion is scheduled to be held on January 14, 2021 at 11:00 am the United States Bankruptcy Court, The Gateway Building, 201 Penn Street, Courtroom # 4, Reading, Pennsylvania. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing.
4. If you do not file a response to the Motion, the court may cancel the hearing and enter an order granting the relief requested in the Motion.
5. You may contact the Bankruptcy Clerk's office(s) in Reading at 610 208-5040 to find out whether the hearing has been canceled because no one filed a response.
6. If a copy of the motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

Filing Instructions

7. If you are required to file documents electronically by Local Bankruptcy Rule 5005-1, you must file your response electronically.
8. If you are not required to file electronically, you must file your response at:

Clerk, U.S. Bankruptcy Court
Eastern District of Pennsylvania
The Gateway Building, Room 103
201 Penn Street
Reading, PA 19601

9. If you mail your response to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.
10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

Charles Laputka, Esquire
Laputka Law Office, LLC
1344 W. Hamilton Street
Allentown, PA 18102

Date: December 17, 2020

Laputka Law Office, LLC

/s/ Charles Laputka, Esquire
Charles Laputka, Esq.
Attorney for Debtors
PAID: 91984
1344 W. Hamilton St.
Allentown, PA 18102